THE WEITZ LAW FIRM, P.A.

September 13, 2021

MEMO ENDORSED

Bank of America Building 18305 Biscayne Blvd., Suite 214 Aventura, Florida 33160

VIA CM/ECF

Honorable Judge Valerie E. Caproni United States District Court Southern District of New York 40 Foley Square, Courtroom 1105 New York, NY 10007-1312 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:____
DATE FILED:__9/14/2021

Re: Velasquez v. 60th Street, LLC, d/b/a The Jeffrey Craft Beer & Bites, et al. Case 1:21-cv-02948-VEC

Dear Judge Caproni:

The undersigned represents the Plaintiff in the above-captioned case matter. Pursuant to Order D.E. 11, dated July 16, 2021, and Order of extension D.E. 13, dated August 12, 2021, Plaintiff must move for default judgment by September 13, 2021. Counsel for Plaintiff states the following:

Plaintiff's counsel has made several inroads in contacting the defendants in this case and has remitted the Order in this matter, along with a courtesy copy of the Complaint and Summons to the defendants by courier and Federal Express mail. Furthermore, the undersigned has hired an investigator to obtain further addresses and/or information on the defendants and has dutifully sent correspondence and courtesy copies of the Complaint and Summons to these alternate addresses and is presently awaiting responses to these efforts.

The undersigned is out of state and has been observing the Jewish holidays of Rosh Hashanah and is observing Yom Kippur this week. Therefore, and for these reasons, the undersigned, respectfully requests an extension of time of 14 days, to move for default judgment in order to allow time for the defendants to contact the undersigned, and to allow for the latest efforts made to result in a response by the defendants, and/or their appearance and answer to the Complaint in this matter.

This Court may wish to take notice that this is the second request for extension of time with regard to the motion for default. Thank you for your attention to this request.

Sincerely,

By: /S/ B. Bradley Weitz

B. Bradley Weitz, Esq. (BW9365) THE WEITZ LAW FIRM, P.A. Attorney for Plaintiff Bank of America Building 18305 Biscayne Blvd., Suite 214 Aventura, Florida 33160 Telephone: (305) 949-7777

Facsimile: (305) 704-3877 Email: bbw@weitzfirm.com

Application DENIED. Pursuant to Rule 2(C) of the Court's Individual Practices in Civil Cases, day-of extension requests are not accepted absent an emergency.

9/14/2021

SO ORDERED.

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE